

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF  
MASSACHUSETTS

FILED  
CLERK OF COURT  
2004 NOV -1 A 10:09

CASE NO. CR 04-10299 CBS

UNITED STATES OF AMERICA

vs.

VALENTIN MARTINEZ

**MOTION FOR CONTINUANCE**


NOW comes the defendant in the above-entitled matter, by and through undersigned counsel, and respectfully moves this Honorable Court to continue the November 1, 2004 date for reasons as follows:

1. The within matter is presently scheduled for Arraignment on Monday, November 1, 2004.
2. Undersigned counsel will be unable to appear due to a scheduling conflict. A protective order was issued by Judge Grabau of Middlesex Superior Court where undersigned counsel was ordered to appear, November 1, 2004 on three matters: Commonwealth v. Lizzie Nunez, Commonwealth v. Santo Marte Peralta and Commonwealth v. Leopoldo Martinez.
3. Undersigned counsel's secretary has spoken with Ms. Lisa Roland, Deputy Clerk, and Assistant U S Attorney, Robert Peabody, to reschedule the Arraignment to Wednesday, November 3, 2004 at 2:30 P.M.

4. The instant request for a continuance is based upon good cause, and is not for the purpose of delay.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

Respectfully submitted,  
VALENTIN MARTINEZ  
By his attorney,

  
RONALD IAN SEGAL  
23 Central Avenue  
Suite 605  
Lynn, MA 01901  
(781) 599-2800

**CERTIFICATE OF SERVICE**

I, Ronald Ian Segal, Esquire, certify that I have forwarded a copy of the within Motion For Continuance by FAXING same, to Assistant United States Attorney Robert Peabody, United States Attorney's Office, One Courthouse Way, Suite 9200, Boston, MA 02210 this 29<sup>th</sup> day of October, 2004.

  
RONALD IAN SEGAL